

**FRANK L. JUDE, JR., et al. v. CITY OF MILWAUKEE, et al.**

**U.S. District Court, Eastern District of Wisconsin  
Case No. 06-C-1101  
The Honorable Lynn Adelman**

**Jonathan S. Safran Time Sheet – Motion to Compel Defendant, Jon  
Bartlett's, Discovery Responses**

**6-3-08**

.2 hours = Review documents and prepare letter to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**7-21-08**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting information regarding Defendant, Jon Bartlett's, possible invocation of the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**7-30-08**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**8-5-08**

.2 hours = Meeting with Bridget E. Boyle to discuss the status of Defendant, Jon Bartlett's, discovery responses

**8-8-08**

.2 hours = Review documents and prepare letter to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.



**8-14-08**

.2 hours = Review documents and prepare follow-up e-mail to Bridget E. Boyle regarding the position of criminal appellate counsel for Defendant, Jon Bartlett as to Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**9-4-08**

.2 hours = Review documents and prepare follow-up e-mail to Bridget E. Boyle regarding the position of criminal appellate counsel for Defendant, Jon Bartlett as to Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**9-15-08**

.2 hours = Teleconference with Bridget E. Boyle regarding criminal appellate counsel for Defendant, Jon Bartlett, recommending that Mr. Bartlett invoke the 5<sup>th</sup> Amendment in his discovery responses, the status of Mr. Bartlett's discovery responses, and inquiry as to possible location for documents responsive to discovery requests.

**10-20-08**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses and inquiry as to the current location of Mr. Bartlett for his deposition.

**12-30-08**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**1-22-09**

.2 hours = Teleconference with Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

**2-5-09**

.1 hours = Telephone call to and message for Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

.1 hours = Teleconference with Bridget E. Boyle's assistant regarding the status of Defendant, Jon Bartlett's, discovery responses

**2-8-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**2-9-09**

.2 hours = Receive and review message from Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

.2 hours = Review documents, telephone call and message, and prepare e-mail to Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

**2-17-09**

.2 hours = Receive and review telephone message from Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

**2-27-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**3-4-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**3-6-09**

.2 hours = Telephone call to and message for Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

.1 hours = Telephone call from Bridget E. Boyle's assistant regarding the status of Defendant, Jon Bartlett's, discovery responses.

**3-9-09**

.2 hours = Teleconference with Bridget E. Boyle's assistant regarding the status of Defendant, Jon Bartlett's, discovery responses.

.2 hours = Receive and review letter from Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

.2 hours = Review documents and prepare letter to Bridget E. Boyle regarding the status of Defendant, Jon Bartlett's, discovery responses.

**3-16-09**

.1 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**3-25-09**

.1 hours = Telephone call to and message for Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**3-26-09**

.1 hours = Teleconference with Bridget E. Boyle's assistant regarding the status of Defendant, Jon Bartlett's, discovery responses.

**4-3-09**

.2 hours = Telephone call, review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**4-6-09**

.1 hour = Receive and review message from Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, document production.

**4-22-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting teleconference regarding the FBI reports on Defendant, Jon Bartlett, and the status of Mr. Bartlett's discovery responses.

**4-28-09**

.1 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting teleconference regarding the status of Defendant, Jon Bartlett's, discovery responses.

**4-30-09**

.1 hours = Telephone call to and message for Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**5-5-09**

.1 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**5-13-09**

.1 hours = Telephone call to and message for Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**5-20-09**

.1 hours = Telephone call to and message for Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**5-29-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**6-2-09**

.2 hours = Review documents, telephone call and message, and prepare e-mail to Bridget E. Boyle requesting the status of Defendant, Jon Bartlett's, discovery responses.

**6-5-09**

.7 hours = Prepare, review and edit Motion to Compel Defendant, Jon Bartlett's, discovery responses, supporting Affidavit with attached exhibits, and prepare motion documents to be filed and served.

.1 hours = Prepare e-mail to Bridget E. Boyle informing her that Motion to Compel Defendant, Jon Bartlett's, discovery responses has been filed.

**6-30-09**

.2 hours = Teleconference with Bridget E. Boyle regarding failure to respond to the Motion to Compel Defendant, Jon Bartlett's, discovery responses and status of Mr. Bartlett's document production.

**8-7-09**

.2 hours = Teleconference with Bridget E. Boyle regarding the deposition of Defendant, Jon Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**8-12-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle regarding the deposition of Defendant, Jon Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**8-19-09**

.2 hours = Appear at Scheduling Conference, record made and Court Order granting Motion to Compel Defendant, Jon Bartlett's, discovery responses.

.2 hours = Prepare e-mail to Bridget E. Boyle regarding Court Order granting Motion to Compel, the deposition of Defendant, Jon Bartlett, and the possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment during his deposition.

.2 hours = Prepare letter to Bridget E. Boyle regarding Court Order granting Motion to Compel, the deposition of Defendant, Jon Bartlett, and the possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment during his deposition.

.3 hours = Receive and review Order granting Motion to Compel Defendant, Jon Bartlett's, discovery responses.

**08-29-09**

.2 hours = Receive and review letter from Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, discovery responses.

**8-31-09**

.1 hours = Telephone call to and message for Bridget E. Boyle regarding the deposition of Defendant, Jon Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle regarding the deposition of Defendant, Jon Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**9-02-09**

.2 hours = Teleconference with Bridget E. Boyle regarding the deposition of Defendant, Jon Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**9-3-09**

.1 hours = Receive telephone call from Bridget E. Boyle's office regarding status of Defendant, Jon Bartlett's, discovery responses.

**9-4-09**

.1 hours = Telephone call to and message for Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, discovery responses.

.1 hours = Telephone call and review message from Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, discovery responses.

**9-8-09**

.1 hours = Telephone call to and message for Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, document production.

.1 hours = Teleconference with Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, document production.

**9-9-09**

.2 hours = Teleconference with Bridget E. Boyle regarding the deposition of Defendant, Jon Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses and document production.

.1 hours = Prepare e-mail to Bridget E. Boyle regarding the deposition of Defendant, Jon Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses and document production.

.1 hours = Receive and review e-mail from Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, document production.

.1 hours = Prepare e-mail to Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, document production.

**9-14-09**

.2 hours = Prepare e-mail to Bridget E. Boyle regarding the pending review of Defendant, Jon Bartlett's, document production, the deposition of Mr. Bartlett, possibility of Mr. Bartlett invoking the 5<sup>th</sup> Amendment in his discovery responses, and the status of Mr. Bartlett's discovery responses.

**9-25-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.



**10-5-09**

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

**11-9-09**

.2 hours = Telephone calls to and messages for Bridget E. Boyle (office and mobile numbers) regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

.2 hours = Review documents and prepare e-mail to Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

**11-18-09**

.1 hours = Review documents and prepare e-mail to Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

**11-25-09**

.5 hours = Review prior correspondence and documents, and prepare e-mail to Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

**12-7-09**

.1 hours = Telephone call to and message for Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

**12-08-09**

.1 hours = Telephone call and review message from Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

.1 hours = Telephone call to and message for Bridget E. Boyle regarding the requested copies from Defendant, Jon Bartlett's, document production, and the status of Mr. Bartlett's discovery responses.

**12-17-09**

.1 hours = Review documents and prepare e-mail to Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, discovery responses and enclosing Order granting Motion to Compel.

.2 hours = Prepare certified letter to Bridget E. Boyle regarding status of Defendant, Jon Bartlett's, discovery responses and enclosing Order granting Motion to Compel.

**12-29-09**

.5 hours = Review, edit and assist in assembling documents for preliminary Motion to Hold Bridget E. Boyle in Contempt for failure to comply with Order granting Motion to Compel and for Attorneys' Fees and Costs associated with the Motion to Compel.

**2-1-10**

.2 hours = Review, edit and prepare Motion to Hold Bridget E. Boyle in Contempt for failure to comply with Order granting Motion to Compel and for Attorneys' Fees and Costs associated with the Motion to Compel.

**2-2-10**

.2 hours = Review, edit and prepare Motion to Hold Bridget E. Boyle in Contempt for failure to comply with Order granting Motion to Compel and for Attorneys' Fees and Costs associated with the Motion to Compel.

**2-3-10**

.2 hours = Review, edit and prepare Motion to Hold Bridget E. Boyle in Contempt for failure to comply with Order granting Motion to Compel and for Attorneys' Fees and Costs associated with the Motion to Compel.

**2-4-10**

.2 hours = Review final draft of Motion to Hold Bridget E. Boyle in Contempt for failure to comply with Order granting Motion to Compel and for Attorneys' Fees and Costs associated with the Motion to Compel, and assist in ECF filing of Motion, Affidavit, Exhibits, and proposed Order.

**TOTAL HOURS: 13.7**